

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN S. KEELER,

Defendants.

)
)
)
)
)
) Case No. 1:20-cr-00238-JRS-TAB-2
)
)
)
)
)
)

The United States of America, by counsel Bradley P. Shepard, Assistant United States Attorney for the Southern District of Indiana, Zachary A. Myers, United States Attorney for the Southern District of Indiana, Corey R. Amundson, Chief of Public Integrity Section of the United States Department of Justice, and William J. Gullotta and John P. Taddei Trial Attorneys at the Public Integrity Section Defendant John S. Keeler, by and through his attorneys, L. Barrett Boss, Karen D. Williams, James J. Bell and Jonathan A. Bont (collectively, “the Parties”) submit the following stipulations.

1. Greg Zoeller is the former elected Indiana State Attorney General.

2. In 2015-2016, Greg Zoeller ran for election in the primary as a Republican candidate to represent Indiana's Ninth Congressional District in the United States House of Representatives.
3. One of Greg Zoeller's opponents was Brent Waltz.
4. John Keeler was an active and early supporter of candidate Greg Zoeller in his campaign for the United States House of Representatives.

The Parties stipulate that if Mindy Colbert were to testify, she would have testified to the following:

1. Mindy Colbert was a contract fundraiser for Greg Zoeller's congressional campaign.
2. John Keeler successfully recruited donors who donated a total of \$19,000 to Attorney General Zoeller's campaign.
3. John Keeler also helped organize a fundraiser that brought in \$21,600.
4. Finally, on behalf of the campaign, Ms. Colbert invited John Keeler to attend strategy sessions and campaign briefings with Mr. Zoeller and other active supporters.

By affixing their signatures hereto, the government and the defendant agree to this stipulation and that said stipulation may be entered into evidence during the course of the trial in the above cause.

04/14/2022
Date: _____

/s/ Bradley P. Shepard

Bradley P. Shepard
Assistant United States Attorney

04/14/2022
Date: _____

/s/ Jonathan A. Bont

Jonathan A. Bont
Attorney for John S. Keeler

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Jonathan A. Bont
Jonathan A. Bont, No. 28476-49